

	A	B	C
1	HHF Comments and Responses on the PA		
2			
3	Number	PA Page Number	Comment
4	1	Misc.	PA circulated a year after consultation meetings
5	2	Misc.	Deficiencies in the PA noted by HHF have not been corrected in the latest version.
6	3	Misc.	Comments requested within 9 working days
7	4	Page 1	Addition of the Navy as a signatory to the PA
8	5	Page 6	Navy's responsibility
9	6		Navy's involvement in proposed mitigation
10	7	Misc.	Effect of the RTA

	D	E
1		
2		
3	Response	FTA Comments
4	<p>The discussion during that time was among the signatory parties and did not include the City. It did include the ACHP which did not object to the signatory party discussions. Nonetheless, the PA has not changed dramatically since November 2009 except as noted in the distribution by the FTA.</p>	<p>The consulting parties have been informed on progress on the PA through emails by FTA since last May and updates provided by other signatories during regular historic preservation call. Consultation can be more than meetings in teleconferences. Although, FTA met with the SHPD and the ACHP a few times between the consulting party meetings last November and May, not many changes occurred. FTA was more focused during that time period on project concerns adjacent to the airport. Consulting parties were encouraged to contact FTA if they had any questions and also received a draft of the Programmatic Agreement to comment on in the Final EIS.</p>
5	<p>Comments made by HHF have been considered and addressed. There are issues that have not been resolved as HHF requested, but which have benefitted from consultation and for which the decision was to present them as shown in the PA. Such are not deficiencies.</p>	
6	<p>The content and the context of the PA has remained largely as it was in November 2009. The time is appropriate for such a review.</p>	
7	<p>The Navy is included because, though they were not active participants during the height of the consultation process, they did participate. They are also included because part of the Project affects Navy property which gives them standing.</p>	
8	<p>The latest PA reflects the wording the Navy requested for its role</p>	
9	<p>No mitigation can be implemented without the Navy's participation on resources within the Navy's jurisdiction.</p>	
10	<p>The RTA does not take effect until July 2011, so there is not yet another agency. When that happens, the RTA will have all the responsibilities for Project activities, including the PA. Still, the RTA is only a semi-autonomous agency and will be required to coordinate with other City agencies for work in other departments.</p>	

	A	B	C
11	8	Attachment to the PA	Effects determination
12	9	Available on the Project website	Historic Effects Report availability
13	10	Attachment to the PA	Effects determination
14	11	APE - Attachment to the PA	Makalapa Housing
15	12	APE - Attachment to the PA	Location of the Pearl Harbor Station
16	13	Page 22	Indirect and cumulative effects of TOD
17	14	Page 23	Stipulations IX.C, D, and E
18	15	Page 25	Treatment plans if SOI standards cannot be met
19	16	Page 22	Kako'o independence

	D	E
11	The effects report defined the effects on all resources identified by the City and FTA as affected. FTA and the City have requested clarification of the additional adverse effects identified by the SHPD. There has never been a response. They were carried forward in the interest of being inclusive rather than exclusive. This has been true from the beginning of the consultation process and has been discussed in several consulting party meetings.	See responses and comments on the same issue in the NTHP responses.
12	This comment is incorrect. The Historic Effects Report has been made available to all consulting parties and is still available on the project website.	
13	The Effects Determination is an attachment to the PA.	it is? I thought we were referencing it in the FEIS.
14	The Makalapa Housing APE was prepared by people with the qualifications to make the proper determinations of the resources and approved by SHPD. Furthermore, the ICRMP is a Navy internal management tool, not a Section 106 document. Should the Navy choose to manage the resources together, it can do so. As far as the rationale for the two separate districts, they served different purposes (officers vs. enlisted housing), are physically separated by a major public thoroughfare and are from different eras. The landscape area is a noncontributing element that happens to be in the vicinity and holds no particular historic significance. In the end, the separation of the two districts does not influence the integrity of the historic resources in any way. The single boundary would appear to gerrymander the resources in such a way as to deliberately cause a hardship to the Project by creating a direct use for no justifiable reason.	
15	The location of the station does not change the effect on the historic resources. The determination of effect does not change with the slight adjustment in the station location. The station was relocated to reduce effects to historic properties as a result of the Section 106 process.	
16	TOD is not a part of the Project, but recognizing there is a connection between TOD and the Project, the concern ignores the fact that among the provisions in the TOD ordinance is the requirement to preserve historic resources. The PA has also recently been revised to take specific account of the effect on the Chinatown and Merchant Street districts. The statement that the City's ordinances "encourage" demolition of historic resources is inappropriate and unfortunate	
17	The wording for these stipulations was developed by the SHPO and reflected as requested in the interest of moving forward.	
18	The kako`o can be positioned to recognize an inability to meet the standards and call for development of a treatment plan that can include the consulting parties	
19	Kako`o is intended to be independent of the FTA and the City and their employees and contractors. The PA will reflect that commitment.	

	A	B	C
20	17	Page 1	Non participant consulting parties
21	18	Page 8	Lessons Learned Manual
22	19	Page 10	Limits of Phase 4 consistency
23	20	Page 14	Number of historic context studies
24	21	Page 15	Number of cultural landscape reports
25	22	Page 6	Navy role
26	23	Page 22	True Kamani trees
27	24	Attachment 1	APE maps do not include the Navy
28	25	Attachment 1	Historic Resource parcel maps panes out of order
29	26	Attachment 1	37 panes mentioned in key, but only 36 included
30	27	Attachment 1	Salt Lake, Airport and Extensions are all shown.
31	28	Attachment 1	Naming of the APE maps
32	29	Attachment 1	APE not delineated on panes 9, 10, 11, 12 and 13a
33	30	Attachment 1	Location of Pearl Harbor Station
34	31	Attachment 1	Two unnumbered maps appear to be of the same location at different scales.

	D	E
20	All invited consulting parties that did not decline consulting party invitation are listed. It was our understanding that this was the preferred approach from ACHP.	
21	This provision was requested by the SHPO. As with all other best practices manuals, it is presumably intended to be used to create a body of experience that will help with future projects to take advantage of what worked and improve upon what did not.	
22	Phase 4 of the Project extends from Middle Street to Ala Moana. The reference to Waiakamilo is not stated as a limit but a reference to the area of greatest concern about the possible discovery of iwi noted by the OIBC. The statement refers to "the entire Phase 4 area, including Waiakamilo Road to Ala Moana Center."	
23	This was discussed during the consultation meetings. It can be as many as 33, but recognizing it most likely will be fewer than that. The reference to a specific number was rejected at that time.	
24	The number will be determined once the PA is executed and within 90 days through studies and outreach as stipulated in the PA.	
25	The latest PA reflects the wording the Navy requested for its role. No evaluation or mitigation of a resource on Navy property will occur without Navy involvement.	
26	The new locations of the trees are not yet defined, but will be as the Project details become clearer. Questions such as transplantation, splicing and the use of keiki are beyond the scope of the PA.	
27	The APE maps used are those approved by the SHPD. The maps had been distributed to the Navy for their review.	Will be revised per our discussion on the phone.
28	Then original maps were numbered first along the Salt Lake Alignment. The Airport Alignment section was added at the end of the Salt Lake Alignment. When the Salt Lake Alignment was eliminated from consideration, the Salt Lake portion was removed. The key map shows how the plates fit together.	
29		
30	The APE maps used are those approved by the SHPD which included all the noted components. They are still shown, but not a part of the selected alignment or the PA. Changes to clarify which elements applicable can be added to the maps.	
31		
32		
33	The station location is the one that was in the approved APE. It has moved slightly south of the location in the APE map to reduce effects to historic properties as a result of the Section 106 process.	
34		

	A	B	C
35	32	Attachment 1	Pane 39a show historic resources beyond the Ala Moana terminus of the PA
36	33	Attachment 2	Title block does not show Navy as a signatory
37	34	Attachment 2	Information on Honouliuli Stream is missing

	D	E
35		
36		
37		